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SAMSUNG SDI BRASIL LTDA.,

SHENZEN SAMSUNG SDI CO., LTD. and

TIANJIN SAMSUNG SDI CO., LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 3:07-md-05944 SC
MDL No. 1917

This Document Relates to:

*Alfred H. Siegel, as Trustee of the Circuit City
Stores, Inc. Liquidating Trust v. Hitachi, Ltd., et
al.*, No. 11-cv-05502;

*Alfred H. Siegel, as Trustee of the Circuit
City Stores, Inc. Liquidating Trust v.
Technicolor SA.*, No. 13-cv-05261;

Best Buy Co., et al. v. Hitachi, Ltd., et al., No.
11-cv-05513;

**DECLARATION OF JAMES L.
MCGINNIS IN SUPPORT OF
DEFENDANTS' MOTION *IN LIMINE*
TO EXCLUDE DR. FRANKEL'S
INFLATION ADJUSTED DAMAGES**

[DEFENDANTS' MIL 7]

1 *Best Buy Co., et al. v. Technicolor SA, et*
2 *al.*, No. 13-cv-05264;

3 *Sears, Roebuck and Co. and Kmart Corp. v.*
4 *Chunghwa Picture Tubes, Ltd., et al.*, No. 11-
cv-05514;

5 *Sears, Roebuck & Co. and Kmart Corp. v.*
6 *Technicolor SA.*, No. 3:13-cv-05262;

7 *Target Corp. v. Chunghwa Picture Tubes, Ltd.,*
8 *et al.*, No. 11-cv-05514;

9 *Target Corp. v. Technicolor SA*, Case No. 13-
cv-05686;

10 *ViewSonic Corp. v. Chunghwa Picture*
11 *Tubes, Ltd., et al.*, No. 14-02510.

12 **REDACTED VERSION OF DOCUMENT SUBMITTED UNDER SEAL**
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1 I, James L. McGinnis, declare as follows:

2 1. I am a partner at the law firm of Sheppard Mullin Richter & Hampton LLP, counsel
3 of record for Defendants Samsung SDI America, Inc.; Samsung SDI Co., Ltd.; Samsung SDI
4 (Malaysia) SDN. Bhd.; Samsung SDI Mexico S.A. De C.V.; Samsung SDI Brasil Ltda.; Shenzhen
5 Samsung SDI Co., Ltd.; and Tianjin Samsung SDI Co., Ltd. (collectively, "SDI"). I submit this
6 declaration in support of the SDI Defendants' Motion *in Limine* to Exclude Direct Action
7 Plaintiffs' Opportunity Cost Damages. I have personal knowledge of the facts set forth herein
8 and, if called as a witness, I could and would competently testify thereto.

9 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the April
10 15, 2014 expert report of Alan S. Frankel, expert witness for certain direct action plaintiffs
11 ("DAPs").

12 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the
13 September 26, 2014 expert rebuttal reports of Alan S. Frankel, certain DAPs' expert witness.

14 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the
15 transcript of the July 10, 2014 deposition of Alan S. Frankel, certain DAPs' expert witness.

16
17 I declare under penalty of perjury under the laws of the United States of America
18 that the foregoing is true and correct.

19 Executed this 13th day of February 2015 in San Francisco, California.

20
21 _____
22 /s/ James L. McGinnis
23 James L. McGinnis
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Exhibit 1

[SUBMITTED UNDER SEAL]

Exhibit 2

[SUBMITTED UNDER SEAL]

Exhibit 3

[SUBMITTED UNDER SEAL]